

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE

---

DANIEL LOVELACE and  
HELEN LOVELACE, Individually, and as Parents of  
BRETT LOVELACE, deceased,

Plaintiffs,

VS.

NO.: 2:13-cv-02289 dkv  
JURY TRIAL DEMANDED

PEDIATRIC ANESTHESIOLOGISTS, P.A.;  
BABU RAO PAIDIPALLI; and,  
MARK P. CLEMONS,

Defendants.

---

**PLAINTIFFS' NOTICE OF SERVICE OF FILING OF  
PLAINTIFF'S ANSWERS TO DEFENDANT MARK P. CLEMONS, M.D.'S  
FIRST SET OF INTERROGATORIES TO PLAINTIFFS**

---

TO: ALL COUNSEL OF RECORD

Notice is hereby given that, on the date entered below, Mark Ledbetter served upon all defense counsel named in the Certificate of Service below, via U.S. Mail, the following pleadings:

- 1) Plaintiffs' Answers to Defendant Mark P. Clemons, M.D.'s First Set of Interrogatories to Plaintiffs.

This 10<sup>th</sup> day of September, 2013

Respectfully submitted,

HALLIBURTON & LEDBETTER

s/P. Mark Ledbetter  
MARK LEDBETTER AR# 74175  
Attorney for Plaintiffs TN#17637  
254 Court Avenue, Suite 305  
Memphis, TN 38103  
(901) 523-8153-phone  
(901) 523-8115-fax

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing has been properly served upon all counsel of record identified below via the Court's ECF filing system:

J. Kimbrough Johnson/Marcy Dodds Magee  
2900 One Commerce Square  
40 S. Main Street  
Memphis, TN 38103  
Attorneys for Mark P. Clemons  
901/525-8721-phone  
901/525-6722-fax  
[Johnsonk@thomasonlaw.com](mailto:Johnsonk@thomasonlaw.com)  
[MageeM@thomasonlaw.com](mailto:MageeM@thomasonlaw.com)

Albert G. McLean/David Cook  
The Hardison Law Firm  
119 S. Main Street, Suite 800  
Memphis, TN 38103  
Attorneys for Babu R. Paidipalli & Pediatric Anesthesiologists, P.A.  
901/525-8776 – phone  
901/525-8790 – fax  
[amclean@hard-law.com](mailto:amclean@hard-law.com)

This 10th day of September, 2013.

s/P. Mark Ledbetter  
MARK LEDBETTER, Certifying Attorney